

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SPECTRUM DYNAMICS MEDICAL LIMITED,

Plaintiff,

v.

GENERAL ELECTRIC COMPANY, GE  
HEALTHCARE, INC., GE MEDICAL SYSTEMS  
ISRAEL LTD., JEAN-PAUL BOUHNİK, SERGIO  
STEINFELD, ARIE ESCHO, and NATHAN  
HERMONY,

Defendants.

Case No.: 18-cv-11386 (VSB)

**NOTICE OF MOTION TO  
DISMISS IN PART  
PLAINTIFF'S COUNTER-  
COUNTERCLAIMS**

**PLEASE TAKE NOTICE** that, upon their accompanying Memorandum of Law and all prior proceedings, pleadings, and filings in this Action, Defendants General Electric Company (“GE”) and Sergio Steinfeld (“Steinfeld”) and non-party Yaron Hefetz (“Hefetz”), by and through their undersigned counsel, shall move in this matter before this Court located at the Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 518, New York, New York 10007, before the Honorable Vernon S. Broderick, United States District Judge, at a date and time to be determined by the Court, to dismiss all of Plaintiff’s counter-counterclaims as to Hefetz pursuant to Rules 12(b)(1), 12(b)(2), and 12(b)(6) of the Federal Rules of Civil Procedure; to dismiss all of Plaintiff’s counter-counterclaims as to Steinfeld pursuant to Rule 12(b)(1); to dismiss Plaintiff’s first and fourth counter-counterclaims, as well as the anticipation and obviousness portions of Plaintiff’s second and fifth counter-counterclaims, as to Steinfeld pursuant to Rule 12(b)(2); to dismiss Plaintiff’s first and fourth counter-counterclaims, as well as parts of Plaintiff’s second and fifth counter-counterclaims, as to GE and Steinfeld pursuant to Rule 12(b)(6); and to dismiss Plaintiff’s third and sixth counter-counterclaims as to Steinfeld pursuant to Rule 12(b)(6).

Dated: Atlanta, Georgia  
September 9, 2020

Respectfully submitted,

**THOMPSON HINE LLP**

/s/ Marla R. Butler

Marla R. Butler  
Carl Wesolowski (*pro hac vice*)  
Lauren Hogan (*pro hac vice*)  
Two Alliance Center  
3560 Lenox Road NE, Suite 1600  
Atlanta, Georgia 30326  
Tel.: (404) 541-2900  
Fax: (404) 541-2905  
Marla.Butler@ThompsonHine.com  
Carl.Wesolowski@ThompsonHine.com  
Lauren.Hogan@ThompsonHine.com

Jesse Jenike-Godshalk (*pro hac vice*)  
312 Walnut Street, Suite 1400  
Cincinnati, Ohio 45202  
Tel.: (513) 352-6700  
Fax: (513) 241-4771  
Jesse.Godshalk@ThompsonHine.com

Brian Lanciault  
335 Madison Avenue, 12th Floor  
New York, New York 10017  
Tel.: (212) 344-5680  
Fax: (212) 344-6101  
Brian.Lanciault@ThompsonHine.com

*Attorneys for Defendants  
General Electric Company, GE Healthcare,  
Inc., GE Medical Systems Israel Ltd., Jean-  
Paul Bouhnik, Sergio Steinfeld,  
Arie Escho, and Nathan Hermony and for  
Non-Party Yaron Hefetz*